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Attorneys for Defendant
WYNN LAS VEGAS, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TIARE RAMIREZ, an individual,
Plaintiff,

v.

WYNN LAS VEGAS, LLC; DOES I through X;
and ROE Corporations XI through XX,
inclusive,
Defendant.

Case No. 2:19-cv-01174-APG-BNW

**STIPULATION AND ORDER TO
EXTEND TIME FOR
DEFENDANT TO FILE REPLY IN
SUPPORT OF MOTION FOR
SUMMARY JUDGMENT**

SECOND REQUEST

Plaintiff TIARE RAMIREZ (hereinafter "Plaintiff") and Defendant WYNN LAS VEGAS, LLC (hereinafter "Defendant"), by and through their respective counsel of record, hereby stipulate and agree to extend the time for Defendant to file a Reply in Support of its Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 12(b)(6), (ECF No. 57), from the current deadline of March 24, 2022, until up to and including **April 7, 2022**. There is good cause for entering into this stipulation due to the fact that counsel for Defendant, Wendy Krincek, had her parent suddenly have a very serious medical emergency arise this week with emergency surgery taking place today, March 18, 2022. Due to this, Ms. Krincek is out of the office and unavailable currently and for the foreseeable future, and given this emergency, more time is needed for the reply.

This is the second request for an extension of time with respect to Defendant's Reply. The

1 parties agree and represent to the Court that this request is made in good faith and not for the purpose
2 of delay.

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4 Dated: March 18, 2022

Dated: March 18, 2022

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Christian Gabroy



8 CHRISTIAN GABORY, ESQ. (#8805)
9 KAINE MESSER, ESQ. (#14240)
GABROY MESSER

WENDY M. KRINCEK, ESQ. (#6417)
KELSEY STEGALL, ESQ. (#14279)
LITTLER MENDELSON, P.C.

10 Attorneys for Plaintiff

Attorneys for Defendant

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12 **ORDER**

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14 **IT IS SO ORDERED.**

15 Date: March 21, 2022

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19 UNITED STATES DISTRICT COURT JUDGE

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